

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

TREVER DANIEL HARDER and  
KYLIE RUBY FLORES,

Defendants.

Case No. 2:21-CR-0165-TOR

STIPULATED PROTECTIVE  
ORDER REGARDING  
IDENTIFICATION OF MINOR  
VICTIMS PURSUANT TO  
18 U.S.C. § 3509

BEFORE THE COURT is the government's Stipulated Motion for Protective Order Regarding Identification of Minor Victims Pursuant to 18 U.S.C. § 3509. The motion was submitted for hearing without oral argument. Having reviewed the record and the files therein, the Court is fully informed. Pursuant to the parties' stipulation and for good cause shown, the motion is GRANTED.

1. IT IS ORDERED that the privacy protection measures mandated by 18 U.S.C. § 3509(d), which apply when a case involves a person under the age of eighteen years who is alleged to be a victim of a crime of sexual exploitation, or a witness to a crime committed against another person, apply to this case.

2. IT IS FURTHER ORDERED that all persons acting in this case in a capacity described in 18 U.S.C. § 3509(d)(1)(B), shall:

a. Keep all documents that disclose the names, identities, or any

1 other information concerning minors in a secure place to which  
2 no person who does not have reason to know their contents has  
3 access;

4 b. Disclose such documents or the information in them that  
5 concerns minors only to persons who, by reason of their  
6 participation in the proceeding, have reason to know such  
7 information;

8 c. Not permit Defendants to review discovery outside the presence  
9 of defense counsel or a defense investigator;

10 d. Not permit Defendants to keep discovery in their own  
11 possession outside the presence of defense counsel or a defense  
12 investigator; and

13 e. Not permit Defendants to keep, copy, or record the identities of  
14 any minor or victim identified in discovery in this case.  
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16 3. IT IS FURTHER ORDERED that all papers to be filed in Court that  
17 disclose the names or any other information identifying or concerning minors shall  
18 be filed under seal without necessity of obtaining a Court order, and that the person  
19 who makes the filing shall submit to the Clerk of the Court:

20 a. The complete paper to be kept under seal; and

21 b. The paper with the portions of it that disclose the names or  
22 other information identifying or concerning children redacted,  
23 to be placed in the public record.

24 4. IT IS FURTHER ORDERED that the parties and the witnesses shall  
25 not disclose minors' identities during any proceedings connected with this case.  
26 The parties and witnesses will refer to alleged minor victims only by using agreed-  
27 upon initials or pseudonyms (e.g., "Minor Victim 1"), rather than their bona fide  
28

1 names, in motions practice, opening statements, during the presentation of  
2 evidence, in closing arguments, and during sentencing.

3 5. IT IS FURTHER ORDERED that the United States may produce  
4 discovery to the defense that discloses the identity and images of alleged minor  
5 victims in this case, in order to comply with the United States' discovery  
6 obligations. Defendants, the defense team, Defendants' attorneys and  
7 investigators, and all of their externs, employees, and/or staff members, shall keep  
8 this information confidential as set forth above.

9 6. IT IS FURTHER ORDERED that this ORDER shall apply to any  
10 attorneys who subsequently become counsel of record, without the need to renew  
11 or alter the ORDER.


12 7. IT IS FURTHER ORDERED that this ORDER shall apply to the  
13 personal identifying information and images of any minors who are identified over  
14 the course of the case, whether or not such minors are known to the United States  
15 and/or Defendants at the time the ORDER is entered by the Court.

16 IT IS SO ORDERED. The Clerk shall enter this Order and furnish copies to  
17 counsel.

18 Dated January 6, 2022.



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A handwritten signature in blue ink that reads "Thomas O. Rice".

THOMAS O. RICE  
United States District Judge